

STAKEHOLDER COMMENT DISPOSITION SUMMARY

REFERENCE CODE			DATE	TYP REV NO.	COMMENT/RESPONSE
16	1	1a	11/13/96	07-96	Comment: Support exists for addressing plutonium dangers as a top priority; constructing a state-of-the-art interim plutonium storage facility at the site;...
					Response: An Interim Storage Vault would be designed to safely contain materials for at least 15 years and up to 50 years without upgrades. However, current DOE plans to ship Pu off site early may negate the need for an onsite vault.
16	1	1b			Comment: Support exists for expeditious deactivation and decommissioning of most of the buildings at the Site.
					Response: See Volume II of the TYP which includes schedules for D&D activities for each of the five TYP cases.
16	1	1c			Comment: Planning assumptions should be subject to further community and/or national discussion. It is imperative that DOE allow adequate time for this process.
					Response: TYP Section 5.2, pages 5-3 through 5-11 which describes the public involvement strategy and schedule for the TYP. DOE will continue to solicit public opinion on a project specific basis. DOE will consult the public about how to best meet these needs. Ultimately, DOE will consider public opinion and make decisions based on the facts available at the time.
1	1	2			Comment: A collaborative decision-making process is required, DOE should proceed only on those projects with a high level of community support.
					Response: DOE will continue to solicit public opinion on a project specific basis and consider all public input before making final decisions. DOE will also work closely with the public to determine how to best meet these needs. Ultimately, DOE will consider public opinion and make decisions based on the facts available at the time. For more detailed information on stakeholder involvement please see TYP Section 5.2, pages 5-3 through 5-11.
2	1	3			Comment: The TYP should not proceed until it has been thoroughly examined in the Rocky Flats Site-wide EIS.
					Response: Section 6.2 of the TYP addresses NEPA compliance. DOE has decided not to expend further resources on completion of a Site Wide EIS. Environmental impacts can be adequately characterized through the RFCA process and individual NEPA documents. DOE will continue to involve the public in these processes.
3	1	4			Comment: DOE should prepare a plan for cleanup beyond ten years that will put the site on a path towards achievement of average background levels.
					Response: The TYP addresses cleanup plans beyond 2006. The TYP will be updated each year to reflect the accomplishments of the past year and incorporate plans for out-years. In addition, the schedules included in the TYP reflect activities at the Site from the present through Site closure which extends beyond ten years. The Site will comply with RFCA regarding cleanup levels. Currently, the RFCA does not state that cleanup to background levels is an objective.

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4a	1	5			Comment: The TYP should state that waste will not be disposed of at Rocky Flats, but will be stored in a monitored, retrievable fashion as long as it remains there.
					Response: See Volume I of the TYP, Section 1.4, which states that waste will be disposed off site and Volume III, PBS numbers 2&3, Section A.1.3 which states waste will be stored in the interim, in a monitored, retrievable fashion.
4b	1	6a			Comment: The TYP should include contingency plans for on-site storage of radioactive wastes in case plans for off site shipment are not viable...
					Response: The TYP acknowledges that if off site shipment is not viable, then on-site storage facilities will need to be made available.
4b	1	6b			Comment: ...Specific dates should be set for implementation of the contingency plans.
					Response: At the time that current TYP assumptions are determined not to be true, contingency plans will be developed. At this time it would not be a wise use of tax payers dollars to design detailed contingency plans that may not be needed.
10	1	7			Comment: Even if WIPP were to open on schedule, its capacity would only be 45,000 cubic meters over the next ten years, while site plans show shipments of 80,000 cubic meters to WIPP. How will DOE resolve this situation?
					Response: The Ten-Year Plan assumes the Site will only generate a total of 15,000 cubic meters of TRU waste. Rocky Flats continues to receive assurances that WIPP will open on schedule and be able to take all Rocky Flats waste.
4a	1	8			Comment: Major waste management and materials storage/disposition decisions should be left open until dialogue is completed.
					Response: DOE Headquarters is conducting a series of national dialogue meetings with the general public and interest groups to get public involvement in these discussions. However, the TYP assumes all waste and materials will be shipped off-site.
2	1	9			Comment: DOE should delay plans for plutonium residues until the EIS has been completed.
					Response: DOE will delay selection of a final plan for residues processing and implementation of that plan until the residues EIS is completed. The current thinking is reflected in the TYP as a place-holder to allow the draft TYP to be submitted on time. The TYP will be subject to updates as more information becomes available. The residue EIS is scheduled to be released in June, 1997 and stakeholders will be notified when it is available for review.
4d	1	10			Comment: The TYP assumes that the residues would not need more processing than currently planned to meet STLs before being sent to WIPP. Now it is known that 40-45% of the residues will not meet STLs. Therefore assumptions for residues in the TYP must be revisited.
					Response: Assumptions concerning residues will be revisited through the EIS process that is currently underway.

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REFERENCE CODE			DATE	TYP REV NO.	COMMENT/RESPONSE
6	1	11			Comment: The TYP should include plans to construct a pilot scale facility for immobilizing plutonium at Rocky Flats to provide valuable demonstration of technology for other sites in the complex.
					Response: See Section XVI of individual PBSs in Volume III of the TYP for discussions of project-specific technology development plans. RFETS current mission is to close down the Site as quickly and efficiently as possible. At present this does not include plans to sponsor projects that would prolong the useful life of the facilities at the Site.
6	1	12			Comment: DOE should provide a list of technology needs, for both the near and long-term, and how it intends to meet those needs. The technology should be based on safety to workers and the public, achieving better performance, and cost.
					Response: See Section XVI of individual PBSs in Volume III of the TYP for discussions of project-specific technology development plans. Factors such as safety to workers and public, improving performance, and dose will be considered in the selection of new technologies to be utilized.
7	1	13			Comment: ...DOE needs to provide a clear, compelling case for privatizing work at Rocky Flats...
					Response: See Section 7.0 of the TYP for a discussion of the Privatization Program.
1	2	1	12/16/96	07-96	Comment: ...There are planning assumptions in the TYP which do not share a high level of community consensus at this time. It would be unwise for DOE to proceed with activities that do not have a high level of community support. These matters should be subject to further community and/or national discussion.
					Response: DOE will continue to work closely with stakeholders and solicit public opinion on specific project decisions (e.g., D&D, ER projects). Ultimately, DOE will consider public opinion and make decisions based on the facts available at the time. See TYP Section 5.2 for more detail.
8	2	2			Comment: It is imperative that the DOE clearly state what will be achieved in ten years, what will be left to do, and what it intends to leave undone.
					Response: We agree. The TYP lays out the work to be done within the next ten years as well as the work remaining at the end of ten years.
1	2	3			Comment: DOE in conjunction with members of the public should develop a collaborative process that substantively involves the public in these important decisions.
					Response: DOE will continue to solicit public opinion on a project specific basis and consider all public input before making final decisions. DOE will also work closely with the public to determine how to best meet these needs. Ultimately, DOE will consider public opinion and make decision based on the facts available at the time. For more detailed information on stakeholder involvement please see TYP Section 5.2, pages 5-3 through 5-11.
2	2	4			Comment:the TYP should not proceed until it has been thoroughly examined in the Rocky Flats SWEIS.

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					Response: Section 6.2 of the TYP addresses NEPA compliance. DOE has decided not to expend further resources on completion of a Site Wide EIS. Environmental impacts can be adequately characterized through the RFCA process and individual NEPA documents. DOE will continue to involve the public in these processes.
8	2	5			Comment:DOE should prepare a plan for cleanup beyond ten years that will put the site on the path toward achievement of background levels.
					Response: The TYP addresses cleanup plans beyond 2006. The TYP will be updated each year to reflect the accomplishments of the past year and incorporate plans for out-years. In addition, the schedules included in the TYP reflect activities at the Site from the present through Site closure which extends beyond ten years. The Site will comply with RFCA regarding cleanup levels. Currently, the RFCA does not state that cleanup to background levels is an objective.
3	2	6			Comment: ...Assistant Secretary Alm committed to a regular review of the SALs, and use of an independent scientific review. Such a review should happen at the earliest possible date and be developed in collaboration with the public.
					Response: As part of the annual review prescribed in paragraph 5 of the Rocky Flats Cleanup Agreement (RFCA), the agencies will be responsible for conducting an internal annual review of the soil action levels. An annual report summarizing the review will be given to the public. As part of the review process stakeholders are encouraged to submit new and applicable information they have pertaining to soil action levels.
3	2	7			Comment: The site should develop contingencies that would be able to address changes in the SALs.
					Response: The TYP will be updated to reflect changes to the soil action levels should they occur in the future.
9	2	8			Comment: It is imperative that the DOE and its contractor develop detailed plan(s) that demonstrates how environmental restoration activities will be developed in a safe manner.
					Response: ER plans are described and evaluated in CERCLA documents (e.g., Proposed Action Memorandum) prepared before each cleanup decision is made. Safety to the workers, the public and the environment are all factors that are considered. Each draft CERCLA document will be subjected to public review and comment.
4d	2	9			Comment: We are encouraged to hear Assistant Secretary Alm declare that waste would not be disposed of at Rocky Flats, but would be stored in a monitored, retrievable fashion for as long as it remains there. This should be written in the TYP.
					Response: See Volume I of the TYP, Section 1.4, which states that waste will be disposed off site and Volume III, PBS numbers 2&3, Section A.1.3 which states waste will be stored in a monitored, retrievable fashion.

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4b	2	10a			Comment: DOE should develop contingency plans for onsite storage in case plans for off site shipment are not viable. DOE should set a date to implement this contingency
					Response: The ASAP phases and other early predecessors of the TYP considered contingency plans for waste storage during the planning processes that led up to the TYP. Our intention is that the TYP will reflect the option that is considered to be the best course of action for the Site. The TYP will of course be subject to change in the future.
4b	2	10b			Comment: DOE should set a date to implement this contingency, (for onsite storage)
					Response: Contingencies for on site low level waste storage have been evaluated and will most likely continue to be examined. Most contingencies do not have a "drop dead" date like WIPP, therefore changes in planned activities will be added into the TYP when assumptions are proven invalid.
4d	2	11			Comment: DOE should develop a ready-to-implement contingency in the event that WIPP does not open in 1998.
					Response: The WIPP contingency is very straight forward - DOE will continue to store TRU waste on site until it can be shipped off site for disposal. Rocky Flats continues to receive assurances that WIPP will open on schedule.
10	2	12			Comment:the Carlsbad office says that WIPP can only handle 45,000 cubic meters (rather than 80,000) of waste over the next ten years. How does DOE plan to resolve this situation? How does this affect the Rocky Flats TYP?
					Response: The Ten-Year Plan assumes the Site will only generate a total of 15,000 cubic meters of TRU waste. Rocky Flats continues to receive assurances that WIPP will open on schedule and be able to take all Rocky Flats waste.
10	2	13			Comment:The TYP should contain contingencies for treatment of this waste, as this facility is not yet built, and faces stiff opposition in Idaho. (Reference to transuranic waste treatment at the Advanced Mixed Waste Treatment Facility)
					Response: Our plan is to ship some TRU waste offsite for treatment. If this assumption proves invalid, we will seek other options, including onsite treatment.
10	2	14			Comment: There is a high level of opposition to most plans for intersite/interstate shipment of waste and nuclear materials for treatment, storage and disposition. Therefore, there should be a national dialogue convened to address these issues.
					Response: This is an issue that DOE Headquarters is addressing on a National level. Several National Dialogue Workshops are planned for the next several months. DOE has scheduled periodic meetings with the public and interest groups to discuss this issue.
5b	2	15			Comment: ...A primary assumption in the TYP is that the Site will proceed with an interim storage facility for plutonium at Rocky Flats. This dictates the wisdom of a new state- of-the-art storage facility. This has a high level of community support and should proceed rapidly. This facility should be designed for a long life as it may hold plutonium for some period of time.

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					Response: An Interim Storage Vault would be designed to safely contain materials for at least 15 years and up to 50 years. Recent decisions regarding the schedule for moving plutonium off site may negate the need for a storage facility.
4d	2	16			Comment: There is currently an EIS planned for the plutonium residues. DOE should not develop plans for these materials until the EIS has been completed, and until their fate has been explored in a national dialogue. (reference to residues)
					Response: DOE will delay selection of a final plan for residues processing and implementation of that plan until the residues EIS is completed.
4d	2	17			Comment: ...It has been learned that 40-45% of the residues will not meet Safeguards Termination Limits. DOE, thus, needs to rework all plans for these residues.
					Response: Assumptions concerning residues will be revisited when decisions on the residues strategy are final. Currently, the Site is investigating the impacts of STLs on residues.
6	2	18			Comment: DOE should determine whether it is possible to stabilize and immobilize plutonium in a single step. Rocky Flats should only treat plutonium currently at Rocky Flats.
					Response: Immobilization of Pu would require the construction of a system to carry out the Pu disposition option(s) chosen by DOE. This choice will not be made until after the completion of a programmatic EIS on Pu disposition. Currently stabilization of Pu at Rocky Flats is necessary in order to be able to transport the Pu off site for long term storage at another location awaiting immobilization. There is no plan to immobilize Pu at Rocky Flats.
11	2	19			Comment:There is a high level of community support for expeditiously addressing D&D activities. However, it is imperative that a plan for safely executing this work be developed and approved by the public and the regulators.....
					Response: Safety to the workers, the public and the environment are all factors that are considered when planning and executing D&D activities. The site is currently working closely with the community on D&D issues. Several meetings have already been held and a comprehensive public process is planned for the next several months.
6	2	20			Comment: DOE should provide a list of technology needs, as it sees them for both the near and the long-term, also how it intends to meet those needs. Technology needs should be based on ensuring worker and public safety, achieving better performance (including achievement of tasks not now possible), and cutting costs.
					Response: See Section XVI of individual PBSs in Volume III of the TYP for discussions of project-specific technology development plans. RFETS current mission is to close down the Site as quickly and efficiently as possible. At present this does not include plans to sponsor technology development projects that would prolong the useful life of the facilities at the Site.

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7	2	21			Comment: DOE needs to provide a clear, compelling case for privatizing work at Rocky Flats.
					Response: See Section 7.0 of the TYP for a discussion of the Privatization Program.
4d	3	1a	none	07-96	Comment: Not only is the opening of WIPP tentative, but the transportation itself is a major problem.
					Response: TRU waste will be shipped to WIPP, when it opens, in special transport vehicles capable of withstanding foreseeable accidents without releasing the contents being carried (i.e., TRU waste).
4d	3	1b			Comment: ...the safety risks on the highway through numerous communities are immeasurable. A safer, more reasonable alternative would be to keep the waste generated at Rocky Flats on site in a retrievable, monitorable situation.
					Response: Waste will not be shipped to WIPP until safety requirements have been met. Waste will be stored at Rocky Flats in monitored retrievable storage until it is shipped off site for disposal. After more than 20 years of study, with independent oversight and public scrutiny DOE is confident that WIPP can isolate TRU waste for the long-term.
5a	3	2			Comment: The plutonium left on site at Rocky Flats should be made more inaccessible, and more difficult to use again in weapons production or any other hazardous form.
					Response: The Pu currently in storage at Rocky Flats that is not in a useable form (such as oxides) has been declared surplus to the defense needs of the nation. Therefore, DOE plans to ship the Pu to another site and place it in long term storage until it can be either reused as fuel for nuclear reactors or otherwise rendered inaccessible for weapons production purposes. The immobilization technologies under consideration include ceramification and vitrification.
3	3	3			Comment: Concerning plutonium, I question the proposed background levels allowable in the Ten Year Plan. Perhaps the levels should be made more conservative.
					Response: DOE, along with the regulatory agencies, will ensure that the Site will be cleaned up to safe levels. Cleanup levels for individual hazardous substance sites will be determined through the process outlined in RFCA. At present, DOE does not plan to clean up the site to naturally occurring background levels along the front range which is consistent with RFCA. Further, as part of the annual review prescribed in paragraph 5 of the Rocky Flats Cleanup Agreement (RFCA), the agencies will be responsible for conducting an internal annual review of the soil action levels. An annual report summarizing the review will be given to the public. As part of the review process stakeholders are encouraged to submit new and applicable information they have pertaining to soil action levels.
5a	4	1	none	07-96	Comment: The troubling assumptions, however, that need serious and further examination in the TYP are: 1) Burial should not be an option. Out of site is not out of mind when dealing with plutonium.

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					Response: See Volume I of the TYP, Section 1.4, which states that waste will be disposed off site and Volume III, PBS numbers 2&3, Section A.1.3 which states waste will be stored in a monitored, retrievable fashion. As for the TRU waste which is planned to be buried at WIPP, DOE is confident that WIPP can isolate TRU waste for the long-term safely. This issue has been carefully studied for more than 20 years, with independent oversight and public scrutiny.
4a	4	2			Comment: Good plans for monitored retrievable storage of waste at Rocky Flats are needed now.
					Response: See Volume I of the TYP, Section 1.4, which states that waste will be disposed off site and Volume III, PBS numbers 2&3, Section A.1.3 which states waste will be stored in a monitored, retrievable fashion.
3	4	3			Comment: The troubling assumptions, however, that need serious and further examination in the TYP are: 3) The cleanup standards must be strengthened. The current 15/85 standard is not protective enough and leaves too much Pu in the soil.
					Response: The RFCA, which contains the negotiated Soil Action Levels, will be reevaluated every year to ensure the 15/85 action level is safe. As part of the annual review prescribed in paragraph 5 of the Rocky Flats Cleanup Agreement (RFCA), the agencies will be responsible for conducting an internal annual review of the soil action levels. An annual report summarizing the review will be given to the public. As part of the review process stakeholders are encouraged to submit new and applicable information they have pertaining to soil action levels.
6	4	4			Comment: Vitrification and ceramification should be considered by the DOE in immobilizing plutonium so that it is harder to reuse in weapons.
					Response: The Pu currently in storage at Rocky Flats that is not in useable form has been declared surplus to the defense needs of the nation. Therefore, DOE plans to ship the Pu to another site and place it in long term storage until it can be either reused as fuel for nuclear reactors or otherwise rendered inaccessible for weapons production purposes. The immobilization technologies under consideration include ceramification and vitrification.
4a	5	1a	11/13/96	07-96	Comment: Radioactive waste should not be buried. It is my feeling that it should not be shipped either.
					Response: This is a DOE Headquarters national issue. We anticipate that this topic will be a part of the National dialogue sessions being sponsored by DOE. Following the cessation of the weapons production activities at Rocky Flats, the decision was made to shift the Rocky Flats mission to one of cleanup and closure. This includes shipping all waste to an offsite repository. As for the TRU waste which is planned to be buried at WIPP, DOE is confident that WIPP can isolate TRU waste for the long-term safely. This issue has been carefully studied for more than 20 years, with independent oversight and public scrutiny.
4a	5	1b			Comment: We need to build and maintain suitable facilities at Rocky Flats for permanent, above ground storage.

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					Response: DOE will provide monitored retrievable storage for waste as long as it remains at Rocky Flats. Current plans are to ship all radioactive waste off site for disposal.
3	5	2			Comment: The clean-up standards proposed are seriously inadequate. We need to approach background radiation levels much more closely.
					Response: The RFCA, which contains the negotiated Soil Action Levels, will be reevaluated every year to ensure the 15/85 action level is safe. As part of the annual review prescribed in paragraph 5 of the Rocky Flats Cleanup Agreement (RFCA), the agencies will be responsible for conducting an internal annual review of the soil action levels. An annual report summarizing the review will be given to the public. As part of the review process stakeholders are encouraged to submit new and applicable information they have pertaining to soil action levels. DOE has no plans to cleanup to background levels.
6	5	3			Comment: Finally, reasonable concerns about security require immobilizing plutonium through vitrification, ceramification, or other means. Whether these concerns can be dealt with in 10 years is immaterial. The planning period may have to be extended.
					Response: The Pu currently in storage at Rocky Flats that is not in useable form has been declared surplus to the defense needs of the nation. Therefore, DOE plans to ship the Pu to another site and place it in long term storage until it can be either reused as fuel for nuclear reactors or otherwise rendered inaccessible for weapons production purposes. The immobilization technologies under consideration include ceramification and vitrification.
8	6	1	none	07-96	Comment: Provisions need to be made for cleanup beyond ten years.
					Response: The TYP addresses cleanup plans beyond 2006. The TYP will be updated each year to reflect the accomplishments of the past year and incorporate plans for out-years. In addition, the schedules included in the TYP reflect activities at the Site from the present through Site closure which extends beyond ten years.
4a	6	2a			Comment: All assumptions for "managing" radioactive waste rely on burial. This is a bad idea for Rocky Flats or anyplace else because the sites will remain radioactive for years to come.
					Response: This is a DOE Headquarters national issue. We anticipate that this topic will be a part of the National dialogue sessions being sponsored by DOE.
4a	6	2b			Comment: Waste should be stored in a retrievable, monitored fashion. (reference to radioactive waste burial)
					Response: DOE will provide monitored retrievable storage for waste as long as it remains at Rocky Flats.
4b	6	3			Comment: Plans should be developed for safe on-site long-term storage at Rocky Flats because shipments off-site are dangerous to the public along the way, and because burial anywhere else is unacceptable and unlikely to happen for a long time.
					Response: DOE will provide monitored retrievable storage for waste as long as it remains at Rocky Flats.

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3	6	4			Comment: Rocky Flats needs to be cleaned up to background levels, not the current 15/85 standard which leaves too much plutonium in soils.
					Response: DOE, along with the regulatory agencies, will ensure that the Site will be cleaned up to safe levels. At this time the agencies believe the 15/85 action levels are protective of human health and the environment. However, the agencies are responsible for conducting an internal annual review of the action levels. An annual report summarizing the review will be given to the public. As part of the review process stakeholders are encouraged to submit new and applicable information they have pertaining to soil action levels. DOE has no plans to cleanup to background levels.
6	6	5			Comment: The DOE should seriously consider immobilizing plutonium through vitrification or ceramification, so that it is easier to retrieve and to make it harder to use the material for weapons production.
					Response: The Pu currently in storage at Rocky Flats that is not in useable form has been declared surplus to the defense needs of the nation. Therefore, DOE plans to ship the Pu to another site and place it in long term storage until it can be either reused as fuel for nuclear reactors or otherwise rendered inaccessible for weapons production purposes. The immobilization technologies under consideration include ceramification and vitrification.
16	6	6			Comment: The TYP's goal to construct a new plutonium vault on-site to assure the safest possible storage, hopefully in a vitrified or ceramified form, is commendable. The goal to deactivate and decommission radioactive buildings at Rocky Flats is also desirable, if done in a safe manner .
					Response: An Interim Storage Vault would be designed to safely contain materials for at least 15 years and up to 50 years without upgrades. However, current DOE plans to ship Pu off site may negate the need for an onsite vault. See Volume II of the TYP which includes schedules for D&D activities for each of the five TYP cases.
3	7	1	none	07-96	Comment: The goal of the cleanup should be to background radiation levels. (reference to 15/85 standard)
					Response: DOE, along with the regulatory agencies, will ensure that the Site will be cleaned up to safe levels. At this time the agencies believe the 15/85 action levels are protective of human health and the environment. However, the agencies are responsible for conducting an internal annual review of the action levels. An annual report summarizing the review will be given to the public. As part of the review process stakeholders are encouraged to submit new and applicable information they have pertaining to soil action levels. DOE has no plans to cleanup to background levels.
4a	7	2			Comment: All radioactive waste must be stored on-site in a safe, monitorable and retrievable manner.
					Response: DOE will provide monitored retrievable storage for waste as long as it remains at Rocky Flats.

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REFERENCE CODE			DATE	TYP REV NO.	COMMENT/RESPONSE
5b	7	3			Comment: Plutonium at Rocky Flats requires a new, state-of-the-art storage facility
					Response: An Interim Storage Vault would be designed to safely contain materials for at least 15 years and up to 50 years without upgrades. However, current DOE plans to ship Pu off site early may negate the need for an onsite vault.
6	7	4			Comment: The DOE needs to invest in vitrification technologies at RFETS to ensure the proliferation/terrorist proof storage of plutonium.
					Response: The Pu currently in storage at Rocky Flats that is not in useable form has been declared surplus to the defense needs of the nation. Therefore, DOE plans to ship the Pu to another site and place it in long term storage until it can be either reused as fuel for nuclear reactors or otherwise rendered inaccessible for weapons production purposes. The immobilization technologies under consideration include ceramification and vitrification.
16	8	1a			Comment: Positive assumptions to the TYP include stabilization and construction of a new state-of-the-art plutonium facility for the safest possible storage of plutonium. As well as D&D of buildings at Rocky Flats in an expeditious manner.
					Response: An Interim Storage Vault would be designed to safely contain materials for at least 15 years and up to 50 years without upgrades. However, current DOE plans to ship Pu off site may negate the need for an onsite vault. See Volume II of the TYP which includes schedules for D&D activities for each of the five TYP cases.
8	8	1b	none	07-96	Comment: ...cleanup beyond ten years needs to be addressed so that the public does not feel that they are left with a contaminated site.
					Response: The TYP addresses cleanup plans beyond 2006. The TYP will be updated each year to reflect the accomplishments of the past year and incorporate plans for out-years. In addition, the schedules included in the TYP reflect activities at the Site from the present through Site closure which extends beyond ten years.
4d	8	2			Comment: Burial of radioactive waste at Rocky Flats should not be considered...
					Response: There are no plans to bury radioactive or hazardous wastes at Rocky Flats. See Volume III, PBS numbers 2&3, Section A.1.3 of the TYP that shows the plans for monitored retrievable storage of waste.
4a	8	3			Comment: On-site long term, monitorable retrievable storage at Rocky Flats should be developed because current plans for off-site shipments may fall through.
					Response: DOE will provide monitored retrievable storage for waste as long as it remains at Rocky Flats.
3	8	4			Comment: ...the soil needs to be cleaned up toward background levels to ensure the safety of the public now and especially in the future when institutional controls may have failed. (reference to 15/85 SALs)

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					Response: DOE, along with the regulatory agencies, will ensure that the Site will be cleaned up to safe levels. At this time the agencies believe the 15/85 action levels are protective of human health and the environment. However, the agencies are responsible for conducting an internal annual review of the action levels. An annual report summarizing the review will be given to the public. As part of the review process stakeholders are encouraged to submit new and applicable information they have pertaining to soil action levels. DOE has no plans to cleanup to background levels. At present, the RFCA does not contemplate a cleanup to background levels.
6	8	5			Comment: Further research into vitrification or other methods of immobilizing plutonium need to be accomplished to ensure that the plutonium at Rocky Flats will not be used in weapons.
					Response: The Pu currently in storage at Rocky Flats that is not in useable form has been declared surplus to the defense needs of the nation. Therefore, DOE plans to ship the Pu to another site and place it in long term storage until it can be either reused as fuel for nuclear reactors or otherwise rendered inaccessible for weapons production purposes. The vitrification technologies under consideration include ceramification and vitrification.
16	9	1a	10/28/96	07-96	Comment: The ten year plan appears to be action oriented with a much shorter time line than previous statements of final closure and cleanup of Rocky Flats--that is to be applauded.
					Response: Thank you for your expression of support.
9,11	9	1b			Comment: DOE should continue to critically assess the potential for exposures which may be created by removal rather than remediation "in place" of materials such as large volumes of contaminated soil and demolition materials from buildings.
					Response: Short term and long term risk of exposure is one of the factors that will continue to be considered in cleanup plans during environmental remediation and D&D.
16	9	1c			Comment: Key administrators, managers and staff of DOE and Rocky Flats seem to have finally taken to heart their mission to close Rocky Flats rather than merely find ways to perpetuate employment opportunities.... I hope this perception is real.
					Response: Rocky Flats has recently changed its contracting strategy to the use of an Integrating Management Contract to provide the appropriate workforce to respond to site priorities. Using an IMC means that fewer people are full time employees at the Site and more people are employed on an as needed basis to complete specific tasks. This strategy will help minimize potential exposure to risk by reducing the size of the Site workforce.
5a	9	1d			Comment: It is not clear from the RFTYP, as presented, that a primary objective is the ultimate disposition of all weapons grade materials into a form that makes them impossible to retrieve and put into a weapon of destruction.
					Response: The Pu currently in storage at Rocky Flats that is not in useable form has been declared surplus to the defense needs of the nation. Therefore, DOE plans to ship the Pu to another site and place it in long term storage until it can be either reused as fuel for nuclear reactors or otherwise rendered

STAKEHOLDER COMMENT DISPOSITION SUMMARY

REFERENCE CODE			DATE	TYP REV NO.	COMMENT/RESPONSE
					inaccessible for weapons production purposes. The immobilization technologies under consideration include ceramification and vitrification.
5a	9	2			Comment: All plutonium and high grade radioactive materials which could be used or reprocessed into weapons, and which have an "attractive characteristic" to any military unit (US or foreign) or any militia or subversive group or is an attractive target for a terrorist should be disposed of in locations designed to prevent it from ever being accessed by such groups.
					Response: The Pu currently in storage at Rocky Flats that is not in useable form has been declared surplus to the defense needs of the nation. Therefore, DOE plans to ship the Pu to another site and place it in long term storage until it can be either reused as fuel for nuclear reactors or otherwise rendered inaccessible for weapons production purposes. The immobilization technologies under consideration include ceramification and vitrification.
12	9	3,4,5			Comment: -Rocky Flats and its buffer still appears to be under consideration as candidate for subsequent development after completion of the TYP. I believe that the only final and very long term suitable land use for Rocky Flats and its buffer zone should be as an exclusion zone with no allowed development of human use of any kind. No consideration for housing, industrial use or access should be made. This land should remain in the hands of national or international authorities and not be transferred to state, local or private control.
					Response: DOE plans to determine future land use when cleanup at the site has been completed. The vision presented in RFCA enables future land use which is consistent with the recommendations of the Future Site Use Working Group (FSUWG).
3	9	6,7			Comment: Soil Action Levels as now adopted by DOE, EPA and Colorado should not be considered the final standard for cleanup at the site. The 15/85 standard should only be used as an initial guideline to identify and prioritize sites for clean up.
					Response: As mentioned, the 15/85 action levels are interim and will be reviewed on an annual basis. 15/85 has been adopted as a guide for future cleanup at the site. DOE, along with the regulatory agencies, will ensure that the Site will be cleaned up to safe levels.
9	9	8a			Comment: Once the site is selected for remediation using 15/85, the As Low As Reasonably Achievable (ALARA) principle should be invoked and remediation carried on to achieve the greatest degree of clean up possible for each discrete site within the reasonably achievable standard.... I remind you that Al Alm has committed to such use of ALARA at the latest citizen summit held just last Saturday.
					Response: Use of ALARA is an ongoing commitment at Rocky Flats regardless of the cleanup level established.

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REFERENCE CODE			DATE	TYP REV NO.	COMMENT/RESPONSE
9	9	8b			Comment: The current 15/85 should be reviewed again and routinely, each time asking sincerely whether it is stringent enough to protect the citizens of Colorado on the long term, particularly those who are down wind and downstream from the site.
					Response: We agree, the agencies are responsible for conducting an internal annual review of the action levels. An annual report summarizing the review will be given to the public. As part of the review process stakeholders are encouraged to submit new and applicable information they have pertaining to soil action levels. DOE has no plans to cleanup to background levels.
3	9	8c			Comment: The relevant regulatory agencies should reconsider whether they have applied a suitable measure of safety by using REM units versus a more specific unit such as soil concentrations of specific radioactive contaminants.
					Response: Cleanup scenarios are compared in the CERCLA process using potential risk of exposure to the environment, workers and the public, and risk is expressed in REMs of exposure. Soil concentration levels are one factor that figures into risk, but risk is also dependent on the length of exposure time which is related to the uses allowed at a cleanup site.
3	9	9a			Comment: Also, it should be made clear that the standards for cleanup at Rocky Flats are being selected to be equally as stringent as standards which would be applied to private nuclear fuel cycle and power company situations.
					Response: Rocky Flats will be cleaned up in accordance with the RFCA as negotiated between EPA, the State of Colorado and DOE. See soil action level discussion above.
5b	9	9b			Comment: A new plutonium vault for Rocky Flats is not a welcome part of the RFTYP.
					Response: An Interim Storage Vault would be designed to safely contain materials for at least 15 years and up to 50 years without upgrades. However, current DOE plans to ship Pu off site early may negate the need for an onsite vault.
6	9	10			Comment: ...all plutonium and weapons grade fissile materials should be converted into forms which are extremely difficult to convert to weapons....
					Response: The Pu currently in storage at Rocky Flats that is not in useable form has been declared surplus to the defense needs of the nation. Therefore, DOE plans to ship the Pu to another site and place it in long term storage until it can be either reused as fuel for nuclear reactors or otherwise rendered inaccessible for weapons production purposes. The immobilization technologies under consideration include ceramification and vitrification.
5a	9	11			Comment: All plutonium should be removed from Rocky Flats to a remote location as soon as possible, in forms which are difficult to reprocess and placed in irretrievable deep earth boreholes or similar final disposition.
					Response: The Pu currently in storage at Rocky Flats that is not in useable form has been declared surplus to the defense needs of the nation. Therefore, DOE plans to ship the Pu to another site and place it in long term storage until it can be either reused as fuel for nuclear reactors or otherwise rendered

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REFERENCE CODE			DATE	TYP REV NO.	COMMENT/RESPONSE
					inaccessible for weapons production purposes. The immobilization technologies under consideration include ceramification and vitrification.
14	9	12			Comment: The management of the Rocky Flats should employ as few people directly on the site as possible during site closure to minimize the potential for exposure of employees and contractors.
					Response: Rocky Flats has recently changed its contracting strategy to the use of an Integrating Management Contract to provide the appropriate workforce to respond to site priorities. Using an IMC means that fewer people are full time employees at the Site and more people are employed on an as needed basis to complete specific tasks. This strategy will help minimize the exposure by reducing the size of the Site workforce.
12	9	13			Comment: The functions of unrelated environmental technology research and development should be done elsewhere and the current site name should be removed and labeled with what it really is, Rocky Flats Closure Project.
					Response: See Section XVI of individual PBSs in Volume III of the TYP for discussions of project-specific technology development plans. RFETS current mission is to close down the Site as quickly and efficiently as possible. How the Site may be used after it is closed down (i.e., future commercial uses) is unclear however public involvement will be a key component of any decisions made.
10	9	14			Comment: All plutonium and weapons potential fissile materials currently or recently stored at Rocky Flats must immediately be declared as surplus by the US government.
					Response: The Pu currently in storage at Rocky Flats that is not in useable form has been declared surplus to the defense needs of the nation. Therefore, DOE plans to ship the Pu to another site and place it in long term storage until it can be either reused as fuel for nuclear reactors or otherwise rendered inaccessible for weapons production purposes. The immobilization technologies under consideration include ceramification and vitrification.
4d	9	15			Comment: The time is long overdue for a command decision to actually move ahead with disposal into facilities such as WIPP, Nevada Test Site (Yucca Mountain) or other well researched disposal options such as deep borehole disposal.
					Response: This is a national issue. WIPP is scheduled to open in May 1998. DOE expects to make other decisions as a result of the Programmatic EIS on Waste Management over the next 18 months. This would not include decisions regarding Yucca Mountain since it is not authorized to receive waste that was generated by defense activities, such as DOE nuclear weapons waste.
4a	10	1a	10/23/96	07-96	Comment: Storage facilities should be constructed to last a long time, I suggest a hundred years.
					Response: Storage facilities will be constructed to safely store waste materials until they can be shipped off site. The plan assumes these materials will be moved off site earlier than 100 years.

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REFERENCE CODE			DATE	TYP REV NO.	COMMENT/RESPONSE
6	10	1b			Comment: The public does not support a vitrification plant at Rocky Flats... Any facilities of this type that are needed should be built at a location where much larger quantities of weapons material are stored.
					Response: The Pu currently in storage at Rocky Flats that is not in useable form has been declared surplus to the defense needs of the nation. Therefore, DOE plans to ship the Pu to another site and place it in long term storage until it can be either reused as fuel for nuclear reactors or otherwise rendered inaccessible for weapons production purposes. The immobilization technologies under consideration include ceramification and vitrification.
9	10	1c			Comment: The goal of cleanup of Pu to average background is not only infeasible; but, undesirable in that it would cause extensive environmental disturbance. I would not support it as part of the Ten Year Plan.
					Response: We agree, DOE does not plan to clean up the site to naturally occurring background levels along the front range. The agencies believe the 15/85 action levels are protective of human health and the environment.
9	10	1d			Comment:it would take a very compelling argument, before I would support not cleaning up and demolishing the buildings at Rocky Flats because this course was believed to be safer.
					Response: See Volume II of the TYP which shows D&D schedules.
9	10	1e			Comment: ...I have concluded that the adapted soil action levels are protective of human health and are a reasonable compromise between what is environmentally desirable and what is reasonable and practical.
					Response: We agree, DOE does not plan to clean up the site to naturally occurring background levels along the front range. The agencies believe the 15/85 action levels are protective of human health and the environment.
4d	10	1f			Comment: Although clearly expressed in the plan, the greatest danger to implementation would seem to be the unpredictability of off-site disposal options for all three classes of materials.
					Response: The ASAP phases and other early predecessors of the TYP considered contingency plans for waste storage during the planning processes that led up to the TYP. Our intention is that the TYP will reflect the option that is considered to be the best course of action for the Site. DOE will provide monitored retrievable storage for waste as long as it remains at Rocky Flats.
12	10	1g			Comment: While future land use is not critical to the Ten Year Plan I believe the community is shifting away from future industrial use.
					Response: The RFCA describes a process for determining future land use. The planned cleanup will allow industrial reuse but no decision has been made.
13	10	2			Comment: The addition of stronger and more detailed contingency planning will alert the public to what changes may be necessary if certain assumptions are not valid.

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REFERENCE CODE			DATE	TYP REV NO.	COMMENT/RESPONSE
					Response: The ASAP phases and other early predecessors of the TYP considered contingency plans for waste storage during the planning processes that led up to the TYP. Our intention is that the TYP will reflect the option that is considered to be the best course of action for the Site. The TYP will of course be subject to change in the future.
4a	11	1	11/18/96	07-96	Comment: Burial of radioactive waste is not a good idea at Rocky Flats or anywhere else because it will result in contamination of the environment for a very long time. Instead, radioactive waste should be stored in a monitored, retrievable fashion.
					Response: This is a DOE Headquarters national issue. We anticipate that this topic will be a part of the National dialogue sessions being sponsored by DOE.
13	11	2			Comment: Plans should be developed for safe on-site long-term storage at Rocky Flats because current plans for offsite shipment may fall through, because of problems associated with transportation, and because burial of waste anywhere is not a good idea.
					Response: Radiological waste will be stored onsite in safe, monitored, retrievable, storage pending offsite shipment.
3	11	3			Comment: Rocky Flats needs stringent cleanup standards that move us toward background levels. (reference to RFCA 15/85 SAL)
					Response: DOE, along with the regulatory agencies, will ensure that the Site will be cleaned up to safe levels. At this time the agencies believe the 15/85 action levels are protective of human health and the environment. However, the agencies are responsible for conducting an internal annual review of the action levels. An annual report summarizing the review will be given to the public. As part of the review process stakeholders are encouraged to submit new and applicable information they have pertaining to soil action levels. DOE has no plans to cleanup to background levels. At present, the RFCA does not contemplate a cleanup to background levels.
6	11	4			Comment: DOE should consider immobilizing plutonium (vitrification or ceramification) at Rocky Flats so that it is harder to reuse the plutonium in weapons.
					Response: The Pu currently in storage at Rocky Flats that is not in useable form has been declared surplus to the defense needs of the nation. Therefore, DOE plans to ship the Pu to another site and place it in long term storage until it can be either reused as fuel for nuclear reactors or otherwise rendered inaccessible for weapons production purposes. The immobilization technologies under consideration include ceramification and vitrification.
5b	11	5			Comment: Stabilizing and putting plutonium in safe forms for storage. (reference to TYP assumptions that should be acted on)
					Response: Immobilization of Pu would require the construction of a system to carry out the Pu disposition option(s) chosen by DOE. This choice will not be made until after the completion of a programmatic EIS on Pu disposition. Currently stabilization of Pu at Rocky Flats is necessary in order to be able to transport the Pu off site for long term storage at another location awaiting immobilization.

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REFERENCE CODE			DATE	TYP REV NO.	COMMENT/RESPONSE
5b	11	6			Comment: Construction of a new state of the art plutonium facility for the safest possible storage of plutonium. (reference to TYP assumptions that should be acted on)
					Response: An Interim Storage Vault would be designed to safely contain materials for at least 15 years and up to 50 years without upgrades. However, current DOE plans to ship Pu off site may negate the need for an onsite vault.
11	11	7			Comment: Expeditious D&D of buildings at Rocky Flats (pending development of a plan for doing such work in a safe manner)....is an assumption that should be acted on.
					Response: See Volume II of the TYP which includes schedules for D&D activities for each of the five TYP cases.
13	12	1	11/06/96	07-96	Comment: ...we urge the DOE to engage in a comprehensive and open process with other sites to identify potential alternatives for interim storage until "disposition" is possible. This process must involve the public.
					Response: The Pu currently in storage at Rocky Flats that is not in pit form has been declared surplus to the defense needs of the nation. Therefore, DOE plans to ship the Pu to another site and place it in long term storage until it can be either reused as fuel for nuclear reactors or otherwise rendered inaccessible for weapons production purposes. The technologies under consideration include ceramification and vitrification.
11	12	2,3			Comment: Facility D&D language throughout the document should be changed to recognize that some buildings may be cleaned and transferred to the community. ...the current use of Buildings 883, 865 and 444/7 for the NCPP and their potential lease to a commercial tenant should also be recognized in the Plan.
					Response: Changes have been made to incorporate reuse language into the TYP. See Section 1.4 and Table ES-1 of Volume I.
4d	12	4a			Comment: We appreciate Al Alm's commitment that any waste stored on-site will be monitored and retrievable and that disposal will not be considered.
					Response: See Volume I of the TYP, Section 1.4, which states that waste will be disposed off site and Volume III, PBS numbers 2&3, Section A.1.3 which states waste will be stored in a monitored, retrievable fashion.
9	12	4b			Comment: We assume the plan calls for the remaining 300 acres in the industrial area also be cleaned up to industrial/office standards. This needs to be added in several places.
					Response: Language has been added in Volume I to the Executive Summary Section and Section 3.1 of the TYP to clarify the cleanup goals of the Industrial Area.
9	12	4c			Comment: The recently adopted 15/85 approach is not adequately reflected in the document that just says 85 mrem and open space uses.
					Response: Language has been added in Volume I to Section 1.4 of the TYP to reference the cleanup standard detailed in the RFCA.

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REFERENCE CODE			DATE	TYP REV NO.	COMMENT/RESPONSE
4d	12	4d			Comment: The TYP states that costs to store, treat and dispose of higher volumes of low level waste could approach \$1 billion. The numbers provided to us previously by K-H as part of the decision analysis exercise were that the highest cost/high volume scenario was \$500/million. A large part of the reason the public has not been able to give specific input about low level waste is that the numbers don't seem reliable.
					Response: Section 3.1, Volume I of the TYP discusses the cost estimating accuracy range presented in the TYP. The estimates in the TYP are the best available at this phase of planning.
15	12	5			Comment: With hundreds of thousands of items of excess personal property, this number (costs recovered from sales) could be large and must be factored in. This is an activity for which cost-savings should be sought and adequate funds budgeted.
					Response: Disposition of excess property, material and equipment is discussed in Volume III of the TYP, PBS number 23.
13	12	6			Comment: We would request the Site in 1997 to simultaneously plan for maximum shipments to WIPP if it opens and also develop a contingency plan for safe, interim storage in DOE's timeline proves optimistic.
					Response: The ASAP phases and other early predecessors of the TYP considered contingency plans for waste storage during the planning processes that led up to the TYP. Our intention is that the TYP will reflect the option that is considered to be the best course of action for the Site. At the time that assumptions are determined not to be true, contingency plans and dates will be developed.
14	12	7			Comment: We would like to know exactly what the implications are of the assumption that workforce management will be conducted strictly per Section 3161? What changes do you plan from past practice?
					Response: The discussion of workforce management has been clarified in Volume I, Section 4.3. Also, DOE has recently approved a workforce restructuring plan which will provide more detail when available.
4d	12	8,9,10			Comment: The TYP states that all sanitary waste will be shipped off site....To what site will it be shipped? What about the new sanitary waste landfill that was just completed?... Could the new disposal cell be used for hazardous or low level waste instead?
					Response: Disposal of sanitary waste is currently being considered for the Waste Management landfill near Leydon, Colorado. No final decision has been made on the future use of the onsite sanitary landfill. There is no plan to use the sanitary landfill for hazardous or low level waste storage or disposal.
6	12	11			Comment: The Ten Year Plan should have a specific component for technology development, transfer and coordination.

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REFERENCE CODE			DATE	TYP REV NO.	COMMENT/RESPONSE
					Response: See Section XVI of individual PBSs in Volume III of the TYP for discussions of project-specific technology development plans. RFETS current mission is to close down the Site as quickly and efficiently as possible. At present this does not include plans to sponsor technology development projects that would prolong the useful life of the facilities at the Site.
11	12	12, 13, 14			Comment: The plan anticipates disposal of "clean" D&D wastes on site. How will this be done? How much area will be removed from reuse potential to accommodate such waste? Is the sanitary landfill being considered for these (D&D) wastes?
					Response: Disposal of sanitary waste is currently being considered for the Waste Management landfill near Leydon, Colorado. The new sanitary landfill that was constructed on site may be used for disposal of uncontaminated building debris from D&D activities. There is no plan to use the sanitary landfill for hazardous or low level waste storage or disposal.
13	12	15			Comment: Contingency plans should be part of the next draft of the Ten Year Plan.
					Response: The ASAP phases and other early predecessors of the TYP considered contingency plans for waste storage during the planning processes that led up to the TYP. Our intention is that the TYP will reflect the option that is considered to be the best course of action for the Site. The TYP will of course be subject to change in the future.
14	12	16			Comment: Workforce planning should add a longer term planning horizon than two years, and these assumptions should be shared with workers and the community.
					Response: See Volume I, Sections 4.1 and 4.3 which shows anticipated funding levels for the IMC and subcontractors that will be employed on site until site closure.
1	12	17a			Comment: Public information and public participation must also be highlighted as an important mission component.
					Response: We agree, public participation is a integral component of the overall closure plan. See TYP Section 5.2, which describes the public involvement strategy and schedule for the TYP. DOE will continue to solicit public input on a project specific basis. Ultimately, DOE will consider public opinion and make decisions based on the facts available at the time.
16	12	17b			Comment: We want to acknowledge that this plan incorporates much of the public input over the last year. We appreciate DOE's responsiveness.
					Response: Thank you for your acknowledgment of our efforts.
15	12	17c			Comment: We insist on DOE's assurance that if the assumptions are wrong-about costs or scope or schedule-that DOE will not be bound by artificial timelines or budgets and that citizens can be assured that the safety and cleanup of the site and protection of the workers, public and environment will not be sacrificed in the name of achieving and artificial goal.
					Response: The TYP will be updated each year to reflect the accomplishments of the past year, changes in funding or assumptions, and to incorporate plans for out-years.

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REFERENCE CODE			DATE	TYP REV NO.	COMMENT/RESPONSE
17	12	18			Comment: ...we request that the preliminary nature of some Rocky Flats Ten Year Plan assumptions be clearly communicated to both DOE Headquarters and the Congress.
					Response: At this point, the entire TYP is preliminary in nature. Assumptions in and of themselves are preliminary in nature because they are not yet facts. DOE recognizes that the Ten Year Planning process will continue to evolve until the Site has been cleaned up and closed.
15	13	1	10/28/96	07-96	Comments: Nowhere do I see a mention of cost containment and consideration of economic factors in choosing between different proposals. I would like to see as an eighth guiding principal to carry out the cleanup in the most economic manner consistent with the above seven principles.
					Response: Rocky Flats is being forced to carefully consider the costs and benefits of all Site activities because of increasing budget constraints. Cost is one of the factors considered in reaching cleanup decisions through the CERCLA process.
11	13	2a			Comment: When a particular route is chosen for waste cleanup or management, have other routes been evaluated on the basis of cost?
					Response: Transportation routes and modes of transportation were evaluated in the Waste Management Programmatic EIS. Cost is one of the factors that will be considered when waste management decisions are issued as a result of the PEIS analysis.
11	13	2b			Comment: Has the cost of this (D&D of buildings) been compared to the cost of encasement in concrete and designation as a National Sacrifice Memorial?
					Response: The cost of entombment of buildings was evaluated in ASAP. No studies have been done regarding designation of a National Sacrifice Memorial.
11	13	2c			Comment: Need all buildings be demolished?
					Response: All buildings do not need to be demolished. RFCA makes a provision for continued use of the Industrial Area for industrial uses.
11	13	2d			Comment: Would it be more economic to store LLW in such buildings and then enclose in concrete?
					Response: DOE has committed to shipping RFETS waste off site in response to public opposition to on site waste disposal.
11	13	2e			Comment: How does the proposed shipment to a private or government depository out of state compare to local storage on site or in a nearby railroad accessible to a geologically suitable canyon, such as proposed by Mr. James Stone?
					Response: The timeliness of available disposal space is much more favorable for an existing commercial or DOE site than for an alternate site that is currently undeveloped and not permitted for disposal.
11	13	2f			Comment: Could some of the buildings slated for demolition be used for cleanup operations?

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REFERENCE CODE			DATE	TYP REV NO.	COMMENT/RESPONSE
					Response: DOE plans to sequence closures so that on site buildings can be used in the cleanup process for as long as possible.
14	13	3			Comment: Why is such a large work force required by the contractor?
					Response: Rocky Flats has recently changed its contracting strategy to the use of an Integrating Management Contract to provide the appropriate workforce to respond to site priorities. Using an IMC means that fewer people are full time employees at the Site and more people are employed on an as needed basis to complete specific tasks. This strategy will help minimize the exposure by reducing the size of the Site workforce. In fact, since 1995, 2500 people have left the Site as employees of the Integrating Team.
4a	13	4			Comment: Do we need a new TRU waste shipping and staging facility, or could an existing building be modified for this use? Likewise for the LLMW treatment and storage facility?
					Response: The ASAP phases and other early predecessors of the TYP considered contingency plans for waste storage during the planning processes that led up to the TYP. Our intention is that the TYP will reflect the option that is considered to be the best course of action for the Site. The TYP will of course be subject to change in the future.
11	13	5			Comment: Can severely contaminated buildings--those in which there were fires or major spills--be demolished without spreading dust or incurring risk to workers?
					Response: There will naturally be some risk to workers as a result of the cleanup of contaminated buildings. However, that risk will be maintained within regulated levels. DOE plans to remove the internal contamination from buildings before they are demolished so that dispersion of contaminated dust to the atmosphere is minimized or eliminated. This process will be subjected to public review.
4	13	6			Comment: Can the radioactivity be specified (in units of pCi/g) which distinguishes TRU waste from LLW? Is TRU waste that from which plutonium might be recovered?
					Response: LLW is distinguished from TRU waste by content of radioactive materials. TRU waste contains 100 nanocuries per gram (100,000 picocuries per gram) or more. The radioactivity may be caused by Pu, U or other content. There is a population of TRU wastes, called "residues" which had economically recoverable Pu content. However, these materials have been declared waste since the Pu is not needed. Many populations of TRU waste were not candidates for Pu recovery processing.
5	13	7			Comment: I would strongly recommend monitored retrievable storage for the SNM despite the preference of many to destroy it (a practical impossibility), or so increase its entropy by dilution, that it would be quite costly to recover it for use a weapon.
					Response: The Pu currently in storage at Rocky Flats that is not in useable form has been declared surplus to the defense needs of the nation. Therefore, DOE plans to ship the Pu to another site and place it in long term storage until it can be either reused as fuel for nuclear reactors or otherwise rendered inaccessible for weapons production purposes. The immobilization technologies under consideration include ceramification and vitrification.

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5b	13	8			Comment: We have safe storage of gold at Fort Knox. Could we not insure the same theft-proof storage for plutonium?
					Response: DOE continues to be responsible for the theft proof storage of Special Nuclear Materials for the weapons complex. Current plans call for consolidation of SNM in a storage facility to be constructed at Savannah River in the near future.
9	13	9			Comment: I recommend that the limit on, or the tolerance for, plutonium content of soil be set in terms of pCi/g rather than possible extra exposure a person could receive in millirems in one year.
					Response: Cleanup scenarios are compared in the RFCA process using potential risk of exposure to the environment, workers and the public, and risk is expressed in REMs of exposure. Soil concentration levels are one factor that figures into risk, but risk is also dependent on the length of exposure time which is related to the uses allowed at a cleanup site. Note that the action level in millirems can be directly linked to Pu content in soils.
9	13	10			Comment: Since the greatest likelihood of health risk from plutonium is inhalation and retention in the lungs, a number of questionable assumptions must be made after the plutonium content of soil has been measured,....
					Response: ER plans are described and evaluated in CERCLA documents prepared before each cleanup decision is made. Safety to the workers, the public and the environment are all factors that are considered.
9	13	11			Comment: Are caps over hot areas adequate? What about groundwater under the caps? Move the plutonium beyond this area. What is a capillary break cap?
					Response: A discussion of the development and construction of the Closure Caps Project can be found in Volume III of the TYP, PBS number 13.
11	13	12			Comment: What about the dust generated (from demolition of buildings)? Do we need to demolish waste-free buildings?
					Response: There will naturally be some risk to workers as a result of the cleanup of contaminated buildings. However, that risk will be maintained within regulated levels. DOE plans to remove the internal contamination from buildings before they are demolished so that dispersion of contaminated dust to the atmosphere is minimized or eliminated. Economic redevelopment of select site buildings is discussed in Volume I, Section 1.4 of the TYP.
4	13	13			Comment: In what respect does plutonium-processed residue fail to meet WIPP acceptance criteria? How will these residues be treated?
					Response: Some residues at Rocky Flats are not properly packaged, contain too much plutonium or materials not acceptable to WIPP. We are currently in the process of developing a treatment strategy which will be presented in the final TYP later this year. We expect some of the treatment may involve repackaging and chemical treatment.

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REFERENCE CODE			DATE	TYP REV NO.	COMMENT/RESPONSE
5b	13	14			Comment: Why choose building 371 as an alternative to off site shipment of plutonium? Is not 371 highly contaminated? Are no other buildings more suitable?
					Response: DOE currently plans to ship Pu off site to another storage location beginning in 1998. B371 was chosen for on site interim storage until the material can be shipped off site because it was constructed to meet newer, more stringent construction standards than the other buildings on site. B371 is not as highly contaminated as the older Pu production facilities on site.
9	14	1	11/14/96	07-96	Comment: I am concerned about the contamination vis-à-vis the nearby citizen population and eventual growth and the environmental impact.
					Response: The principal motivation for the cessation of operations at Rocky Flats and the change in mission was the proximity of the site to the Denver metropolitan area. The TYP is intended to chart a course for cleaning up the contamination and removing the Special Nuclear Material and the risks they pose to nearby populations.
4a	14	2			Comment: As long as any radioactive waste remains at Rocky Flats, it must be isolated from the environment, fully monitored, and stored in an easily retrievable form.
					Response: DOE will provide monitored retrievable storage for waste as long as it remains at Rocky Flats.
9	14	3			Comment: Optimum cleanup standards must be observed so that soil, air and water are devoid of plutonium traces.
					Response: DOE, along with the regulatory agencies, will ensure that the Site will be cleaned up to safe levels. Cleanup levels for individual hazardous substance sites will be determined through the RFCA process. At present, DOE does not plan to clean up the site to naturally occurring background levels along the front range.
15	14	4			Comment: Human, animal and plant health should be your only concern. Decrease in cleanup funds is not acceptable.
					Response: The vision at Rocky Flats is to reach site closure. Funds are being allocated to address the situations that pose the highest risk to the workers, public and the environment first.
4a	15	1	11/20/96	07-96	Comment: I am in favor of keeping contamination generated at Rocky Flats in monitored retrievable storage units at Rocky Flats. There is as yet no technology available to truly "clean up" radioactive waste, and no one knows when there will be.
					Response: DOE will provide monitored retrievable storage for waste as long as it remains at Rocky Flats. Development of cleanup technologies is an ongoing national issue which will be closely tracked by Rocky Flats.
4d	15	2			Comment: How can we be assured that even in one or two generations anyone would know with certainty where the waste was buried?

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					Response: This is a DOE Headquarters national issue. We anticipate that this topic will be a part of the National dialogue sessions being sponsored by DOE.
6	15	3			Comment: For the foreseeable future, any existing technology, such as vitrification, should be employed to render plutonium unsuitable for weapons use.
					Response: The Pu currently in storage at Rocky Flats that is not in useable form has been declared surplus to the defense needs of the nation. Therefore, DOE plans to ship the Pu to another site and place it in long term storage until it can be either reused as fuel for nuclear reactors or otherwise rendered inaccessible for weapons production purposes. The immobilization technologies under consideration include ceramification and vitrification.
8	16	1	11/22/96	07-96	Comment: Even though I am cheered to know Rocky Flats is a top priority for "clean up" and knowledgeable opinions are actively being sought about the best ways to do this, I am very concerned about the ten year time frame.
					Response: The TYP addresses cleanup plans beyond 2006. The TYP will be updated each year to reflect the accomplishments of the past year and incorporate plans for out-years. In addition, the schedules included in the TYP reflect activities at the Site from the present through Site closure which extends beyond ten years. The goal is to reach cleanup in 10 years. Funding, technical and political issues may affect this goal, but it is our goal none-the-less .
4a	16	2			Comment: A monitored retrievable storage plan is what is needed at Rocky Flats until a more permanent proposal has been thoroughly investigated.
					Response: DOE will provide monitored retrievable storage for waste as long as it remains at Rocky Flats.
5	16	3			Comment: For now it is critically important that plutonium be stabilized and put into the safest containers available for storage. The process of vitrification will further remove the possibility of plutonium being reused for weaponry.
					Response: Immobilization of Pu would require the construction of a system to carry out the Pu disposition option(s) chosen by DOE. This choice will not be made until after the completion of a programmatic EIS on Pu disposition. Currently stabilization of Pu at Rocky Flats is necessary in order to be able to transport the Pu off site for long term storage at another location awaiting immobilization.
5b	16	4			Comment: The construction of a storage facility at Rocky Flats should also coincide in priority with the decommissioning of other buildings on site.
					Response: An Interim Storage Vault would be designed to safely contain materials for at least 15 years and up to 50 years without upgrades. However, current DOE plans to ship Pu off site may negate the need for an onsite vault.
4b	17	1a	11/11/96	07-96	Comment: Waste will be transported in unsafe casks and containers, to waste-stream sites which are variously not yet open/may never be opened, short-term, unsafe, unlined, uncertified, litigated against, over-filled and located on seized lands, sacred Native American lands, ethnic communities' lands, lands

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					over known earthquake faults and in unstable rock/soil, and lands only a few miles from major rivers?
					Response: There is a risk of transporting waste to WIPP and other disposal sites. However, there is also risk of storing wastes in close proximity to the Denver Metro area. Waste will not be shipped to WIPP until safety requirements have been met. Waste will be stored at Rocky Flats in monitored retrievable storage until it is shipped off site for disposal.
10	17	1b			Comment: Dumpsites like WIPP, even if it is OKed by EPA, and wins probable lawsuits against it, will not have enough capacity to handle the already existent TRU and TRU/mixed wastes scheduled to be dumped there?
					Response: This is a national DOE issue. Rocky Flats continues to receive assurances that WIPP will open on schedule and be able to take Rocky Flats waste.
10	17	1c			Comment: There is a proposed weakening of standards governing the already inadequate quality of containers used to transport, say, plutonium on land, in sea and air, (i.e., standards less rigorous than required for black boxes.).
					Response: DOE will abide by the standards established for shipping containers used to ship DOE plutonium and wastes. Containers undergo rigorous testing and certification before they are approved for use.
9	17	1d			Comment: The interim soil action levels formula--15/85 millirems per year--is based on pico-curies per gram of soil and cannot be translated into safety and health levels for people.
					Response: 15/85 has been adopted as a guide for future cleanup at the site. DOE, along with the regulatory agencies, will ensure the Site will be cleaned up to safe levels. The 15/85 standard is an expression of the levels of dose people in the area would receive from residual contamination left in place.
8	17	2			Comment: We need a plan that goes beyond the Ten Year Plan.
					Response: The TYP addresses cleanup plans beyond 2006. The TYP will be updated each year to reflect the accomplishments of the past year and incorporate plans for out-years. In addition, the schedules included in the TYP reflect activities at the Site from the present through Site closure which extends beyond ten years.
4c	17	3			Comment: We need to put the RF waste materials into a non-weapons useable form.
					Response: The Pu currently in storage at Rocky Flats that is not in useable form has been declared surplus to the defense needs of the nation. Therefore, DOE plans to ship the Pu to another site and place it in long term storage until it can be either reused as fuel for nuclear reactors or otherwise rendered inaccessible for weapons production purposes. The immobilization technologies under consideration include ceramification and vitrification.
4a	17	4			Comment: We need a new state-of-the-art storage building at RF

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					Response: An Interim Storage Vault would be designed to safely contain materials for at least 15 years and up to 50 years without upgrades. However, current DOE plans to ship Pu off site may negate the need for an onsite vault.
7	17	5			Comment: We need to develop guidelines which would assure complete accountability, and work force stability with regard to any privatization measures that are taken.
					Response: See Section 7.0 of the TYP for a discussion of the Privatization Program.
12	17	6			Comment: Rocky Flats needs to be maintained as Open Space in the buffer zone areas, and as a rad-waste and environmental research center later on. It must not be considered for any other use.
					Response: DOE plans to determine future land use when cleanup at the site has been completed and in accordance with RFCA. DOE has had recommendations for use of the Buffer Zone as open space from the Future Site Use Working Group. Residential development was not recommended by the FSUWG, but continued industrial use of the present industrial area was acceptable to the group.